

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03 MDL 1570 (RCC)

This document relates to:

02 CV 6977 (RCC)

KATHLEEN ASHTON, et al,
Plaintiffs,
v.

NOTICE OF MOTION

AL-QAEDA ISLAMIC ARMY, et al.
Defendants.

PLEASE TAKE NOTICE, that upon the annexed Affidavit of Saleh Bin A. Al-Saikhhan, the accompanying Memorandum of Law, and all prior papers and proceedings herein, defendant International Islamic Relief Organization of Saudi Arabia, will move before the Honorable Richard Conway Casey, United States District Court for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, for the following relief:

(a) dismissal of the plaintiffs' Fourth Amended Complaint pursuant to Fed.

R. Civ. P. 12(b)(2) for lack of personal jurisdiction; or

(b) should the Court exercise personal jurisdiction over Defendant

International Islamic Relief Organization of Saudi Arabia, dismissal of the plaintiffs' Fourth Amended Complaint pursuant to Fed. R. Civ. P.

12(b)(6) for failure to state a claim upon which relief can be granted;

(c) and for any such further relief as the Court deems just and proper.

Dated: March 19, 2004

Respectfully submitted,

/s/

Martin F. McMahon (MM 4389)
Stephanie Fell (SF 2474)
Martin McMahon & Associates
1150 Connecticut Ave., N.W.
Ste. 900
Washington, D.C. 20036
(202) 862-4343

*Attorneys for Defendant
International Islamic Relief
Organization of Saudi Arabia*